

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:18-cr-20174
Judge: Cox, Sean F.
MJ: Whalen, R. Steven
Filed: 03-15-2018 At 03:24 PM
INDI USA VS. KIMPSON, ET AL (DP)

VIOL: 21 U.S.C. § 846
21 U.S.C. § 841
18 U.S.C. § 924(c)

D-1 Kari De-Marco Kimpson,
D-2 Bradford Jones,
D-3 Derrick Solomon, and
D-4 Christine Rourke

Defendants

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. §§ 846, 841(a)

Conspiracy to possess with intent to distribute a controlled substance

D-1 Kari De-Marco Kimpson
D-2 Bradford Jones
D-3 Derrick Solomon
D-4 Christine Rourke

From on or about October 20, 2017 through November 2, 2017, in the Eastern District of Michigan, Southern Division, the defendants, Kari De-Marco Kimpson, Bradford Jones, Derrick Solomon, and Christine Rourke, knowingly and intentionally combined, conspired, confederated, and agreed with each other and

with other individuals, both known, and unknown to the Grand Jury, to commit the following offense against the United States: to possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1); all in violation of Title 21, United States Code, Section 846.

COUNT TWO

21 U.S.C. § 841(a), 18 U.S.C. § 2

Possession with Intent to Distribute Controlled Substances, Aiding and Abetting

D-1 Kari De-Marco Kimpson
D-2 Bradford Jones
D3- Derrick Solomon
D-4 Christine Rourke

On or about October 20, 2017, in the Eastern District of Michigan, Southern Division, the defendants, Kari De-Marco Kimpson, Bradford Jones, Derrick Solomon, and Christine Rourke, did aid and abet and did knowingly and unlawfully possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a).

COUNT THREE

21 U.S.C. § 841(a), 18 U.S.C. § 2

Possession with Intent to Distribute Controlled Substances, Aiding and Abetting

D-1 Kari De-Marco Kimpson

D-2 Bradford Jones

D-3 Derrick Solomon

D-4 Christine Rourke

On or about October 26, 2017, in the Eastern District of Michigan, Southern Division, the defendants, Kari De-Marco Kimpson, Bradford Jones, Derrick Solomon and Christine Rourke, did aid and abet and did knowingly and unlawfully possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a).

COUNT FOUR

21 U.S.C. § 841(a), 18 U.S.C. § 2

Possession with Intent to Distribute Controlled Substances, Aiding and Abetting

D-2 Bradford Jones,
D-3 Derrick Solomon
D-4 Christine Rourke

On or about November 2, 2017, in the Eastern District of Michigan, Southern Division, the defendants, Bradford Jones, Derrick Solomon, and Christine Rourke, did aid and abet and did knowingly and unlawfully possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a).

COUNT FIVE

21 U.S.C. § 841(a)

Possession with Intent to Distribute Controlled Substances

D-1 Kari De-Marco Kimpson

On or about November 2, 2017, in the Eastern District of Michigan, Southern Division, defendant Kari De-Marco Kimpson, did knowingly and unlawfully possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a).

COUNT SIX

21 U.S.C. § 841(a)

Possession with Intent to Distribute Controlled Substances

D-1 Kari De-Marco Kimpson

On or about November 2, 2017, in the Eastern District of Michigan, Southern Division, defendant Kari De-Marco Kimpson did knowingly and unlawfully possess with the intent to distribute crack cocaine, a Schedule II controlled substance, in violation of Title 21 United States Code, Section 841(a).

COUNT SEVEN

18 U.S.C. § 924(c)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

D-1 Kari De-Marco Kimpson

On or about November 2, 2017, in the Eastern District of Michigan, Southern Division, the defendant, Kari De-Marco Kimpson, did knowingly and unlawfully possess One Taurus, .45 caliber handgun and One, Smith and Wesson, rifle in furtherance of a drug trafficking crime for which Kari De-Marco Kimpson may be prosecuted in a court of the United States, specifically, the crime of possession with intent to distribute controlled substances, as alleged in Counts Eight and Nine of this Indictment, which constitutes a violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 21 United States Code, Section 853, and Title 28 United States Code, Section 2461(c).

Upon conviction of the offenses set forth in Count Seven, of this Indictment, the defendant Kari De-Marco Kimpson, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28 United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of the offenses and/or any firearm or ammunition intended to be used in any offense punishable under the Controlled Substances Act (21 U.S.C. § 801, *et seq.*) including, but not limited to: One Taurus, .45 caliber handgun, and One Smith and Wesson rifle.

Upon conviction of any of the controlled substance offenses alleged in Counts One through Six of this Indictment, named defendants shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the named violations.

If any of the property described in the paragraphs above as being forfeitable under, as a result of any act or omission of the defendant - -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America, pursuant to Title 21, United States Code, Section 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

MATTHEW SCHNEIDER
United States Attorney

/s/ Matthew Roth
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Dated: March 15, 2018

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <u>JMW</u>

Case Title: USA v. Kari Kimpson et al

County where offense occurred : Wayne

Check One: **Felony** **Misdemeanor** **Petty**

 Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number: 18-30121]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 15, 2018

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.